

ESTTA Tracking number: **ESTTA743557**

Filing date: **05/02/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91227047
Party	Defendant Viajes Beda S.A. de C.V.
Correspondence Address	JEFFREY M. FURR Furr Law Firm 2622 DeBolt Rd Utica, OH 43080-9604 JeffMFurr@FurrLawFirm.com
Submission	Answer
Filer's Name	Jeffrey M. Furr
Filer's e-mail	jeffmfurr@furrlawfirm.com
Signature	/jmf/
Date	05/02/2016
Attachments	bdtravelsolutionanswer.pdf(79115 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of
Application Serial Numbers
86727183, 86727157, 86727148, 86727134

BCD N.V.

Opposer,

v.

Opposition No. 91227047

VIAJES BEDA S.A. DE C.V.

Applicant.

UNITED STATES PATENT AND
TRADEMARK TRIAL AND APPEAL BOARD
PO BOX 1451
ALEXANDRIA VA 22313-1451

APPLICANT’S ANSWER TO NOTICE OF OPPOSITION

Applicant, Viajes Beda S.A. de C.V. (“Applicant”), for its answer to the Notice of Opposition filed by BCD N.V.. against application for registration of Applicant’s trademark BD TRAVELSOLUTION, Serial Numbers 86727183, 86727157, 86727148 and 86727134, pleads and alleges as follows:

1. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 1 and on that basis denies same.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 2 and on that basis denies same.

3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 3 and on that basis denies same.
4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 4 and on that basis denies same.
5. Applicant denies the allegations stated in paragraph 5.
6. Applicant admits the allegations stated in paragraph 6.
7. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations stated in paragraph 7 and on that basis denies same.
8. Applicant denies the allegations stated in paragraph 8.
9. Applicant denies the allegations stated in paragraph 9.
10. Applicant denies the allegations stated in paragraph 10.
11. Applicant denies the allegations stated in paragraph 11.
12. Applicant denies the allegations stated in paragraph 12.
13. Paragraph 13 is a statement the does not need to be admitted or denied.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed in its entirety, and that a registration issue to Applicant for its marks.

Respectfully Submitted,

/jmf/
Jeffrey M. Furr 38,146
Attorney for Applicant
Viajes Beda S.A. de C.V.
2622 Debolt Road
Utica, Ohio 43080
740-817-2381 (telephone)
740-892-3860 (fax)

JeffMFurr@FurrLawFirm.com

CERTIFICATE OF FILING

I hereby certify that this answer is being electronically filed with the United States Patent and Trademark Trial and Appeal Board on the 2nd day of May, 2016.

/jmf/
Jeffrey M. Furr, Esquire

CERTIFICATE OF SERVICE

I hereby certify that this paper is being deposited on the 2nd day of May, 2016 with the United States Postal Service in an enveloped addressed to:

James A. Trigg
Kilpatrick Townsend & Stockton LLP
1100 Peachtree Street, Suite 2800
Atlanta, GA 30309

/jmf/
Jeffrey M. Furr, Esquire